

04-186

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Mt. Vernon. Net, Inc. has been a WISP operator serving the rural under-served markets in and around Mt. Vernon, Il. since 1999. Last month we had 100 people ask for service that we had to tell we could not serve. The reason is simple. We only have access to low power higher frequencies (Above 1 GHz) that will not penetrate foilage, trees and other obstacles. This is highly aggravating to potential broadband customers who have no other real broadband options. WISPs do our best to fill this void but we need help. We need frequencies we can use to serve those who cannot get service any other way.

WISPs are operated very much like the average family farm. Though we may not be large corporate entities with massive budgets we do work hard with limited resources to bring quality broadband services in areas where it would not otherwise be available. WISPs are often very small companies who may be a one-man show or only have two or three employees. It is very common to call the main telephone number of a local WISP operator and actually have the owner answer the phone while he is on top of a grain elevator or water tower working on the system. This NPRM will help the to expand their operations to help them serve more customers effectively.

Small WISP operators may be a minor part of the overall broadband picture according to official documentation but please consider this. It is not uncommon for a WISP to serve 100 to 200 customers. This is below the 250-customer threshold required for reporting by the FCC. I am sure there are a great many of these "Micro Broadband Operators" who serve a very large portion of the overall rural broadband market. In fact I am reasonably certain that rural WISPs are the largest percentage of providers of rural broadband in the United States. I am sorry I do not have exact figures to back this up. What I can tell you is that WISP oriented conferences draw hundreds of WISP attendees on a regular basis. WISPs are banding together through the WISPA association, which recently filed as a true 501c6 corporation and is founded by WISP operators for WISP operators to help in delivering the common voice needed by WISPs for their benefit and more importantly the benefit of the customers they serve. I mention these facts in order to draw attention to what I believe is most important in this proceeding. That is serving rural broadband customers effectively. What do WISPs really need to effectively serve their potential customer base?

WISPs do not need subsidies.

WISPs do not need extensive regulatory relief.

WISPs do not need spectrum auctions that are not available to small family run operators.

WISPs need access to sub-1 GHz spectrum to help bring broadband to their customers.

I cannot over-state this need. I support this NPRM to help open the responsible unlicensed use of the unused television bands and I support the comments of WISPA.